

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

MINING PROJECT WIND DOWN HOLDINGS,
INC. (f/k/a Compute North Holdings, Inc.), *et al.*,

Debtors.¹

Chapter 11

Case No. 22-90273 (MI)

(Jointly Administered)

**JOINT STATEMENT CONCERNING AGREED JOINT
SCHEDULING ORDER ON PLAN ADMINISTRATOR'S
OBJECTION TO CLAIM OF BITNILE, INC. [CLAIM NO. 42]
[Relates to Docket No. 1202]**

NOW COME Tribolet Advisors LLC, as Plan Administrator in the above-captioned bankruptcy cases of Mining Project Wind Down Holdings, Inc. *et al.* (the “Debtors”), and BitNile, Inc. (“BitNile”), and respectfully submit the following statement in support of entry of the Proposed Scheduling Order (as defined herein):

WHEREAS, on February 1, 2023, BitNile filed proof of claim number 42 (the “Claim”) in the above-captioned bankruptcy cases; and

¹ The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, include: Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551); Mining Project Wind Down Atoka LLC (f/k/a CN Atoka LLC) (4384); Mining Project Wind Down BS LLC (f/k/a CN Big Spring LLC) (4397); Mining Project Wind Down Colorado Bend LLC (f/k/a CN Colorado Bend LLC) (4610); Mining Project Wind Down Developments LLC (f/k/a CN Developments LLC) (2570); Mining Project Wind Down Equipment LLC (f/k/a CN Equipment LLC) (6885); Mining Project Wind Down King Mountain LLC (f/k/a CN King Mountain LLC) (7190); Mining Project Wind Down MDN LLC (f/k/a CN Minden LLC) (3722); Mining Project Wind Down Mining LLC (f/k/a CN Mining LLC) (5223); Mining Project Wind Down Pledgor LLC (f/k/a CN Pledgor LLC) (9871); Mining Project Wind Down Member LLC (f/k/a Compute North Member LLC) (8639); Mining Project Wind Down NC08 LLC (f/k/a Compute North NC08 LLC) (8069); Mining Project Wind Down NY09 LLC (f/k/a Compute North NY09 LLC) (5453); Mining Project Wind Down STHDAK LLC (f/k/a Compute North SD, LLC) (1501); Mining Project Wind Down Texas LLC (f/k/a Compute North Texas LLC) (1883); Mining Project Wind Down TX06 LLC (f/k/a Compute North TX06 LLC) (5921); and Mining Project Wind Down TX10 LLC (f/k/a Compute North TX10 LLC) (4238). The Reorganized Debtors' service address for the purposes of these chapter 11 cases is 2305A Elmen Street, Houston, TX 77019.

WHEREAS, on February 13, 2023, the Debtors filed an objection to the Claim [Docket No. 964]; and

WHEREAS, on March 13, 2023, BitNile filed a response to the Debtors' objection to the Claim [Docket No. 1057]; and

WHEREAS, on July 20, 2023, the Parties filed the *Agreed Joint Scheduling Order on Debtors' Objection to Claim of BitNile, Inc. [Claim No. 42]* (the "Proposed Scheduling Order") [Docket No. 1202]; and

WHEREAS, on July 24, 2023, the Court conducted a scheduling conference on the Proposed Scheduling Order and recorded courtroom minutes on the docket which provide in pertinent part that: "Parties are to confer and file a statement requesting entry of the existing proposed scheduling order or will file a new proposed scheduling order within 14 days as stated on the record." [Docket No. 1205]; and

WHEREAS, counsel for the Parties have conferred and agree to entry of the Proposed Scheduling Order.

WHEREFORE, the Parties respectfully request that the Court enter the Proposed Scheduling Order, and such other and further relief as the Court deems just and proper.

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Dated: August 7, 2023

Respectfully submitted,

/s/ Charles R. Gibbs

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Certificate of Service

I certify that on August 7, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Gibbs

Charles R. Gibbs